REMARKS/ARGUMENTS

Applicant would like to thank the Examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office action, and amended as necessary to more clearly and particularly describe the subject matter which applicant regards as the invention.

Claims 1, 3-5, 8, 10-12, 19, and 31 have been amended due to formal matters. Claims 3-5 and 10-13 have also been amended to correct the multiple dependencies.

The title has been amended as requested by the examiner.

Claims 1-3, 8-10, 15-21, and 23-32 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Mindrum (U.S. Patent No. 6,340,078) in view of Arellano et al. (U.S. Patent No. 6,694,482). For at least the following reasons, the examiner's rejection is respectfully traversed.

None of the references disclose or suggest "calculating a correlation among information sets written in said extracted element indexes, and obtaining a set of element indexes from said extracted element indexes whose correlation satisfies an evaluation reference" as recited in claim 1. Arellano is cited as teaching these elements.

Arellano discloses a User Agent that analyzes a user's data and computes correlations between features and the values the features can hold as defined by the memory based learning framework (col. 9, lines 43-54). In Arellano, a Story Agent chooses the best set of content elements based on given application-specific criteria (col. 10, lines 4-10). Since Arellano only calculates correlations between *features* and *the value the features can hold*, Arellano fails to disclose or suggest calculating a correlation among information sets in multiple element indexes. Arellano discloses that content elements are chosen based on given application-specific criteria. However, Arellano does not disclose or suggest that the content elements are specifically chosen

when the correlation satisfies an evaluation reference. Therefore, even if combined, the references do not disclose or suggest all the elements of the claimed invention.

With regards to claim 8, none of the references disclose or suggest, "calculation means for calculating a correlation among information sets written in said extracted element indexes, and for obtaining a set of element indexes from said extracted element indexes whose correlation satisfies an evaluation reference" as recited for claim 8.

As mentioned previously for claim 1, Arellano discloses a User Agent that analyzes a user's data and computes correlations between features and the values the features can hold as defined by the memory based learning framework (col. 9, lines 43-54). In Arellano, a Story Agent chooses the best set of content elements based on given application-specific criteria (col. 10, lines 4-10). Since Arellano only calculates correlations between *features* and *the value the features can hold*, Arellano fails to disclose or suggest calculation means for calculating a correlation among information sets in multiple element indexes. Although Arellano discloses that content elements are chosen based on given application-specific criteria, Arellano also fails to disclose or suggest that the content elements are specifically chosen when the correlation satisfies an evaluation reference. Therefore, even if combined, the references do not disclose or suggest all the elements of the claimed invention.

With regards to claim 19, none of the references disclose or suggest "agitation means for performing, according to a pseudo physical rule, agitation simulation for said plurality of scenario element indexes, and for repeating said agitation simulation until a set of scenario element indexes is obtained from said plurality of scenario element indexes that match an evaluation reference for a predetermined condition setting for a scenario creation" as recited in claim 19. Similar language is found in claim 31.

Mindrum does not disclose or suggest agitation means for performing agitation simulation

for scenario element indexes. Mindrum also does not disclose or suggest repeating agitation simulation until scenario element indexes are obtained that match an evaluation reference. Arellano does not overcome the deficiencies of the Mindrum patent. Arellano fails to disclose or suggest agitation means for performing agitation simulation for scenario element indexes. Arellano also fails to disclose or suggest repeating agitation simulation until scenario element indexes are obtained that match an evaluation reference. Therefore, even if combined, the references do not disclose or suggest all the elements of the claimed invention.

Furthermore, there is no suggestion or motivation for one skilled in the art at the time the invention was made to combine Arellano with Mindrum to arrive at the claimed invention. Mindrum consists of a method of producing and presenting a life story recording of a person. In Mindrum, a customer gives personal information, such as pictures, documents, data, and audio/video, to be stored in a database and then a template is used with the stored information to develop a life story recording based upon customers's chosen format or style. There is no suggestion or motivation in Mindrum to produce the life story in any other manner. Arellano consists of a method of creating and presenting interactive multimedia content that can dynamically adapt to a user. There is no suggestion or motivation in Arellano a non-interactive content system. Therefore, is no need or motivation to look at or use the Arellano content selection methods to modify Mindrum. Thus, there is no motivation or suggestion to combine Arellano with Mindrum.

The desirability to have such a method is found only in the Applicant's own description of the invention, in contrast to the requirement that the teaching or suggestion to make the modification must be found in the prior art and not based on an applicant's disclosure. Reconsideration and withdrawal of the rejection based upon the combination of references is respectfully requested.

In light of the foregoing, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No. 35880.

Respectfully submitted,

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